



TO: CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA
111 SEVENTH AVE. SE, BOX 15
CEDAR RAPIDS, IA 52401

FROM: GARRET MUELLER, CONTROLLER, VENTURA MEDSTAFF LLC

DATE: APRIL 21, 2025

RE: OBJECTION TO OBJECTION TO CLAIM AND NOTE OF OBJECTION BAR DATE (CLAIM #10025)

Good afternoon,

Ventura MedStaff LLC ("Ventura") received the above-referenced Objection to Claim and Notice of Objection Bar Date dated March 16, 2025. This memorandum serves as notice that Ventura is objecting to the Trustee's objection based on the following criteria:

- I. Mercy Hospital, Iowa City (herein referred to as the "debtor") incurred significant operating liabilities to Ventura in the form of travelling healthcare staff. The Trustee need look no further than the records of Medefis, the debtor's contracted Managed Service Provider, to see that these invoices remain unpaid as of filing date of the debtor's bankruptcy.
- II. Payment statuses for all invoices due from the debtor are attached to this objection.
- III. The Trustee has not done its due diligence in deeming these balances as paid or undue to Ventura. Objection to the Claim based upon the Claim being paid, even if it were true, should be accompanied by proof of payment in the form of remittance information.

Ventura MedStaff LLC is still General Un-secured Non-Priority Claim holder against the debtor, and nothing as provided by the Trustee has proven otherwise. We look forward to continuing this dialogue throughout the bankruptcy process and collecting the amounts due as part of the agreed-upon liquidation plan.

A handwritten signature in black ink, appearing to read 'Garret Mueller', written in a cursive style.

Garret Mueller
Controller
Ventura MedStaff LLC
2909 N. 118th Street, Ste. 200
Omaha, NE 68164

(402) 252-4507
gmueller@venturamedstaff.com

